

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

MARILYN F. QUIRIN, as Executor of the	)	
Estate of RONALD J. QUIRIN, Deceased,	)	
	)	
Plaintiff,	)	
	)	Civil Action No. 13-2633
vs.	)	
	)	
LORILLARD TOBACCO COMPANY, et al.,	)	
	)	
Defendants.	)	

**MOTION FOR DISMISSAL**

Now comes Defendant, Union Carbide Corporation ("Union Carbide") by attorneys Heyl Royster Voelker & Allen, and advises the Court that Plaintiff Marilyn Quirin, as representative of the estate of Ronald Quirin and Defendant Union Carbide Corporation have reached an agreement for settlement, Plaintiff having provided notice of such settlement on 10/3/13, Doc. #201, and requests dismissal with prejudice from the instant action, and in support thereof, states as follows:

1. After arms' length negotiation, Plaintiff and Union Carbide have entered into a settlement agreement in good faith.
2. Union Carbide respectfully requests dismissal with prejudice of the present cause of action as to Union Carbide, parties to bear their own costs.

UNION CARBIDE CORPORATION

BY:                     /s/ Tobin J. Taylor                      
HEYL, ROYSTER, VOELKER & ALLEN  
Tobin J. Taylor #6238227

HEYL, ROYSTER, VOELKER & ALLEN  
124 SW Adams Street, Suite 600  
Peoria, IL 61602  
Telephone: 309.676.0400  
Facsimile: 309.676.3374

HEYL, ROYSTER, VOELKER & ALLEN  
19 S. LaSalle St., Suite 1203  
Chicago, IL 60603  
Telephone: 312.853.8700

MAYER BROWN LLP  
Firm I.D. 43948  
Richard F. Bulger  
71 S. Wacker Drive  
Chicago, IL 60606  
Telephone: 312.782.0600  
Facsimile: 312.701.7711

KIRKLAND & ELLIS LLP  
Tom Morel  
300 N. LaSalle  
Chicago, IL 60654  
Telephone: 312.862.2000  
Facsimile: 312.862.2200

**PROOF OF SERVICE**

The undersigned states that on the 4<sup>th</sup> day of December, 2013, Union Carbide Corporation served its Motion for Dismissal in the above-styled case. A copy of this document was provided to Plaintiff's counsel, Waters Kraus, & Paul, LLP, 3219 McKinney Ave Dallas, TX 75204

/s/ Tobin J. Taylor  
Tobin J. Taylor

TJT/mjd